

## LEVIN-EPSTEIN & ASSOCIATES, P.C.

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August 19, 2020

**Via Electronic Filing**

The Honorable Judge Edgardo Ramos  
U.S. District Court Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Ortiz Ochoa et al v. Prince Deli Grocery Corp. et al*  
**Case No.: 18-cv-09417-ER**

Dear Honorable Judge Ramos:

This law firm represents Defendants Prince Deli Grocery Corp. (d/b/a Prince Deli Grocery) and Abdo S. Anam (a/k/a Abdo Saleh) (together, the “**Defendants**”) in the above-referenced action.

Pursuant to Rule 1(E) of Your Honor’s Individual Motion Practices, this letter respectfully serves as a joint request to extend the fact discovery completion deadline & non-expert deposition completion deadline from August 31, 2020 to, through and including October 19, 2020 (*i.e.*, the current fact discovery completion deadline).

This is the second request of its nature, and is made jointly with Plaintiff. If granted, this request would affect the case management conference currently scheduled for September 23, 2020. Thus, this application also requests an adjournment of the September 23, 2020 case management conference to a date and time set by the Court after October 19, 2020. This is the first request of its nature, and is also made on consent of Plaintiff.

The basis of the request is that Plaintiff’s counsel has only recently provided responses and objections to Defendants’ discovery requests, and supplemental discovery requests, which were served on July 1, 2019 and June 16, 2020, respectively. In addition, Defendant is in the process of providing responses and objections to Plaintiff’s discovery requests, which were served on July 10, 2020.

A second, independent basis also necessitates an extension of the existing discovery completion deadline through October 19, 2020. The undersigned law firm will be observing the Jewish high holydays of Rosh Hashanah, Yom Kippur, Sukkot, Shemini Atzaret and Simchat Torah. As such, the undersigned law firm will have limited availability during the month of September.

Thus, Defendants respectfully request that: (i) the fact discovery completion deadline & non-expert deposition completion deadline be extended from August 31, 2020 to, through and including October 19, 2020; and (ii) the September 23, 2020 case management conference be adjourned to a date and time set by the Court after October 19, 2020

Thank you, in advance, for your time and attention.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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VIA ECF: All Counsel